

EXHIBIT 3

From: [Gary Davis](#)
To: william.droze@troutman.com
Cc: [Stacy Snow](#); [Jeff Friedman](#); [Andy Davis](#); [Lee Patterson](#)
Subject: Parris v. Mount Vernon Mills, et al.
Date: Tuesday, October 25, 2022 6:01:22 PM
Attachments: [image001.png](#)

William,

This is in regard to your response to our First Requests for Production of Documents and, specifically the response to Request No. 1. In your response you object to producing documents created before February 23, 2016, without stating the basis for this objection. Then, you state that "without waiving the foregoing objections" documents will produced subject to the Protective Order and you will identify documents withheld based on the objections.

I our review of documents so far, it looks like you did not produce documents responsive to Request No. 1 that were older than 2016, but we are uncertain at this point.

We don't believe there is any basis for the 2016 limitation, especially given that MVM is still discharging PFAS that were phased out in 2002 (e.g, PFOS) and we are aware of PFAS sales in the 1990s. I would like to discuss this with you this week if possible if you can give me a time that is convenient to you.

Thanks,

Gary



21 Battery Park Avenue
Suite 206
Asheville, NC 28801
Phone: 828-622-0044
Fax: 828-398-0435
enviroattorney.com

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